

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA §
§ CRIM. No.: 4:18-CR-572(2S)
v. §
§
ISMAEL RODRIGUEZ-SERRANO (01) §
a/k/a Onesimo Rodriguez-Serrano, §
DANIEL LOPEZ-GARCIA (02) §
a/k/a Carlos Teran-Rojo, §
JOSE NUNEZ-ARELLANO (03), §
a/k/a "Manuel," a/k/a "Viejon," §
HUBER NUNEZ-ARELLANO (04), §
a/k/a "Gordo," §
Defendants. §

United States Courts
Southern District of Texas
FILED

JUN 06 2019

David J. Bradley, Clerk of Court

SECOND SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT ONE
(Conspiracy to Commit Hostage Taking)
(Title 18 U.S.C. §1203(a))

From on or about August 12, 2018 to on or about August 23, 2018, in the Houston Division of the Southern District of Texas and elsewhere, the defendants,

ISMAEL RODRIGUEZ-SERRANO
aka Onesimo Rodriguez-Serrano,
DANIEL LOPEZ-GARCIA
aka Carlos Teran-Rojo, and
JOSE NUNEZ-ARELLANO,

did combine, conspire, confederate and agree with each other and with others both known and unknown to the Grand Jury, to intentionally seize and detain and threaten to kill, injure,

and continue to detain in the United States, foreign nationals, in order to compel others to do an act, namely, to pay a sum of money as an explicit and implicit condition for the release of the foreign nationals.

In violation of Title 18, United States Code, Section 1203(a).

COUNT TWO
(Hostage Taking)
(Title 18 U.S.C. §1203(a) and 2)

From on or about August 12, 2018 to on or about August 23, 2018, in the Houston Division of the Southern District of Texas and elsewhere, the defendants,

ISMAEL RODRIGUEZ-SERRANO
aka **Onesimo Rodriguez-Serrano,**
DANIEL LOPEZ-GARCIA
aka **Carlos Teran-Rojo, and**
JOSE NUNEZ-ARELLANO,

each aiding and abetting the other, did intentionally seize and detain and threaten to kill, injure, and continue to detain in the United States, a certain foreign national, namely Migdael Mazariegos-Salazar, in order to compel a third person to do an act, namely, to pay a sum of money as an explicit and implicit condition for the release of the said foreign national.

In violation of Title 18, United States Code, Section 1203(a) and (2).

COUNT THREE
(Conspiracy to Harbor & Transport Illegal Aliens)
Title 8 U.S.C. §§ 1324 (a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii) and 1324 (a)(1)(B)(i)

From on or about March 31, 2018 to on or about August 23, 2018, in the Houston

Division of the Southern District of Texas and elsewhere, the defendants,

ISMAEL RODRIGUEZ-SERRANO
aka Onesimo Rodriguez-Serrano,
DANIEL LOPEZ-GARCIA
aka Carlos Teran-Rojo,
JOSE NUNEZ-ARELLANO, and
HUBER NUNEZ-ARELLANO,

did knowingly combine, conspire, confederate and agree, with each other and with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is: to transport and harbor illegal aliens within the United States, in any manner whatsoever, knowing and in reckless disregard of the fact that such aliens had come to, entered, and remained in the United States in violation of law, contrary to Title 8, United States Code, Sections 1324 (a)(1)(A)(ii), 1324(a)(1)(A)(iii), and 1324 (a)(1)(B)(i).

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

COUNT FOUR

(Conspiracy to Harbor & Transport Illegal Aliens)

Title 8 U.S.C. §§ 1324 (a)(1)(A)(v)(I), 1324(a)(1)(A)(ii), 1324(a)(1)(A)(iii) and 1324 (a)(1)(B)(i)

From on or about October 20, 2018 to on or about November 28, 2018, in the Houston Division of the Southern District of Texas and elsewhere, the defendant,

JOSE NUNEZ-ARELLANO,

did knowingly combine, conspire, confederate and agree, with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is: to transport and harbor illegal aliens within the United States, in any manner whatsoever, knowing and in reckless disregard of the fact that such aliens had come to, entered, and

remained in the United States in violation of law, contrary to Title 8, United States Code, Sections 1324 (a)(1)(A)(ii), 1324(a)(1)(A)(iii), and 1324 (a)(1)(B)(i).

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

NOTICE OF FORFEITURE
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The United States gives notice to defendants,

**ISMAEL RODRIGUEZ-SERRANO
aka Onesimo Rodriguez-Serrano,
DANIEL LOPEZ-GARCIA
aka Carlos Teran-Rojo, and
JOSE NUNEZ-ARELLANO,**

that in the event of conviction of an offense in violation of Title 18, United States Code, Section 1203(a) as charged in Counts One and Two of this Indictment, all property, real or personal, which constitutes or is derived from proceeds traceable to such violation is subject to forfeiture.

NOTICE OF FORFEITURE
(18 U.S.C. § 982(a)(6); 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c))

The United States gives notice to defendants,

**ISMAEL RODRIGUEZ-SERRANO (01)
a/k/a Onesimo Rodriguez-Serrano,
DANIEL LOPEZ-GARCIA (02)
a/k/a Carlos Teran-Rojo,
JOSE NUNEZ-ARELLANO (03),
a/k/a “Manuel,” a/k/a “Viejon,”
HUBER NUNEZ-ARELLANO (04),
a/k/a “Gordo,”**

that in the event of conviction of an offense in violation of Title 8, United States Code, Section 1324(a) as charged in Counts Three and Four of this Indictment, the following property is subject to forfeiture:

- (1) All conveyances, including any vessel, vehicle, or aircraft, used in the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);
- (2) All real and personal property that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);
- (3) All real and personal property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense pursuant to 18 U.S.C. § 982(a)(6); and
- (4) All conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense, the gross proceeds of such violation, and all property traceable to such conveyances or proceeds pursuant to 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c).

Property Subject To Forfeiture

Defendants are notified that the property subject to forfeiture includes, but is not limited to, the following property:

- (1) Approximately \$2,922.00 in United States currency seized on or about August 23, 2018 seized from Daniel Lopez-Garcia.

(2) An aggregate sum of approximately \$12,011.00 in United States currency seized on or about November 28, 2018 from a house in Houston, Texas.

MONEY JUDGMENT; SUBSTITUTE ASSETS

Defendants are notified that in the event of conviction, a money judgment may be imposed. Defendants are notified that in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.

A TRUE BILL:

[Signature] Original Signature on File
FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
United States Attorney

By:

[Signature]
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